

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

IN RE:	Chapter 11
MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> ,	Case No. 23-00623 (TJC)
Debtors.	Jointly Administered
	Objection Deadline: August 20th , 2024, at 4:00 pm (CT)

**SUMMARY OF FIFTH FEE APPLICATION OF DAY RETTIG MARTIN, P.C. AS
COUNSEL TO THE OFFICIAL COMMITTEE OF PENSIONERS FOR ALLOWANCE
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM MARCH 1, 2024, THROUGH MARCH 31, 2024**

Name of Applicant: Day Rettig Martin, P.C.

Authorized to Provide Professional Services to: Official Committee of Pensioners

Date of Retention: November 4, 2023

Date of Order Authorizing Retention: November 13, 2023, Doc. 506

Period for which Compensation and Reimbursement is Sought: March 1, 2024, through March 31, 2024

Amount of Compensation Sought as Actual, Reasonable and Necessary: \$33,456.00 (80% of \$41,820.00)

Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary: \$0.00

Application Type: Monthly

SUMMARY OF DAY RETTIG MARTIN, P.C. APPLICATIONS FOR COMPENSATION

Application	Date Filed	Period Covered	Requested Fees	Requested Expenses	Fees & Expenses Paid to Date
First	04/15/24	11/04/23 – 11/30/23	\$20,544.00 (80% of 25,680.00)	\$0.00	\$20,544.00
Second	04/15/24	12/01/23 – 12/31/23	\$16,902.00 (80% of 21,127.50)	\$70.74	\$16,972.74

Third	05/28/24	01/01/24 – 01/31/24	\$20,682.00 (80% of 25,852.50)	\$0.00	\$20,682.00
Fourth	08/06/24	02/01/24 – 02/29/24	\$24,960.00 (80% of \$31,200.00)	\$36.18	\$0.00
Fifth	08/06/24	03/01/24 – 03/31/24	\$33,636.00 (80% of 42,045.00)	\$0.00	\$0.00

**SUMMARY OF BILLING BY PROFESSIONALS
MARCH 1, 2024 – MARCH 29, 2024**

Name of Professional	Position, Department, Year of Bar Admission	Hourly Billing Rate	Total Billed Hours	Total Compensation
Paula L. Roby	Shareholder, Bankruptcy Bar Admission: 1999	\$375.00	110.60	\$33,180.00 (80% of \$41,475.00)
Julie G. Quist	Paralegal	\$150.00	2.3	\$276.00 (80% of \$345.00)
TOTALS:			112.09	\$33,636.00 (80% of \$41,820.00)

**COMPENSATION BY PROJECT CATEGORY
MARCH 1, 2024 – MARCH 29, 2024**

Project Category	Total Hours	Total Fees
A. Asset Analysis and Recovery	2.2	\$825.00
B. Case Administration	4.9	\$1,612.50
C. Court Hearings	7.5	\$2,812.50
D. Employment and Fee Applications	1.3	\$195.00
E. Litigation	0.0	N/A
F. Litigation Planning	5.6	\$1,987.50
G. Meetings and Communications with Professionals	66.10	\$24,787.50
H. Pension Analysis	2.6	\$975.00
I. Plan and Disclosures Statement	15.8	\$5,925.00
J. Review Pleadings	7.5	\$2,812.50

K. Other Contested Matters	0.0	N/A
L. Travel (billed at 50%)	0.0	\$0.0
TOTALS:	109.5	\$42,045.00

EXPENSE SUMMARY
MARCH 1, 2024 – MARCH 29, 2024

Expense Category	Service Provider (if applicable)	Total Expenses
N/A	0.0	\$0.00
TOTALS:	0.0	\$0.00

Day Rettig Martin, P.C. (the “Applicant” or “DRM”), counsel to the Official Committee of Pensioners (the “Pensioners Committee”) in the above-captioned chapter 11 case (the “Chapter 11 Case”), hereby applies (the “Application”), pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Court’s *Order Establishing Procedures for Interim Compensation And Reimbursement of Expenses of Professionals* (Doc. 224) (the “Interim Compensation Order”), for allowance of compensation for services rendered and reimbursement of expenses for the period from **March 1, 2024 through March 31, 2024** (the “Application Period”), and respectfully represents as follows:

1. The Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b).
2. Venue of the Chapter 11 Case and this Application in this District is proper under 28 U.S.C. §§ 1408 and 1409.

3. The legal predicates for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, and the Interim Compensation Order.

BACKGROUND

A. Formation of the Official Committee of Pensioners

4. On August 7, 2023, (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Northern District of Iowa (the “Court”) commencing these bankruptcy cases.

5. On September 13, 2023, Paula L. Roby of DRM appeared for a group of Mercy Pensioners (Doc. 212) and on October 4, 2023, for the Mercy Pensioners Ad-Hoc Committee (Doc. 332).

6. On October 18, 2023, counsel for the Mercy Pensioners Ad-Hoc Committee filed a Motion to Establish an Official Committee of Pensioners Under 11 U.S.C. § 1102 (a)(2) (Doc. 385). A hearing on the Motion was held October 27, 2023, and the Motion was granted November 3, 2023 (Doc. 451). The following day, eight members of the Mercy Pensioners Ad-Hoc Committee were appointed to serve as the Official Committee of Pensioners (the “Pensioners Committee”) (Doc. 458).

B. The Retention of Day Rettig Martin, P.C.

7. On November 8, 2023, the Pensioners Committee applied to the Court (Doc. 479) (the “DRM Application”) for an order authorizing it to retain and employ DRM as their counsel, effective as of November 4, 2023. On November 13, 2023, the Court entered an order authorizing such retention (Doc. 506).

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RELIEF REQUESTED

8. All services for which compensation is requested were performed for or on behalf of the Pensioners Committee. During the compensation period, DRM received no payment and no promises of payment from any source other than the Debtors for services to be rendered in any capacity in connection with the matters covered by this Application. There is no agreement or understanding between DRM and any other person, other than members of DRM for sharing of any compensation to be received for services rendered in the Chapter 11 Case.

9. Pursuant to the Interim Compensation Order and Bankruptcy Code section 331, DRM is seeking compensation in the amount of \$33,456.00, which is equal to eighty percent (80%) of the \$41,820.00 in fees for professional services rendered by DRM during the Application Period. This amount is derived solely from the applicable hourly billing rates of DRM's personnel who rendered services to the Debtors. In addition, DRM incurred \$0.00 in out-of-pocket expenses during the Application Period.

A. Compensation Requested

10. Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by DRM with respect to the Chapter 11 Case during the Application Period. This detailed itemization complies with the Interim Compensation Order and the Bankruptcy Code in that each time entry contains a separate time allotment, a description of the type of activity, and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

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11. The attorney(s) and paraprofessional(s) who rendered services related to each project category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation sought for each category.

B. Expense Reimbursement

12. DRM incurred out-of-pocket expenses during the Application Period in the amount of \$0.00. Descriptions of the expenses actually occurred are identified in **Exhibit A** in relation to each project category. The expenses are broken down into categories of charges.

13. DRM provided a wide array of legal services to the Pensioners Committee. The services rendered by DRM are separated by project category and are more fully described in the Summary of Services by Project spreadsheet attached to this Application as **Exhibit B**.

CONCLUSION

14. DRM believes that the time entries, rates, and expenses included in **Exhibit A** are reasonable, customary, and in compliance with the requirements of the Bankruptcy Code and the Interim Compensation Order.

15. DRM reserves the right to correct, amend, or supplement this Application, including, without limitation, to seek payment in the event this Application is not approved in full.

WHEREFORE, DRM respectfully requests that the Court enter an order: (i) awarding DRM allowance of (a) eighty percent (80%) of the fees for the Application Period in the amount of \$33,456.00; and (b) the reimbursement of one-hundred percent (100%) of the actual and necessary expenses DRM incurred during the Application Period in the amount of \$0.00; (ii) authorizing and directing the Debtors to pay DRM \$33,456.00, representing the total amount owed for the Application Period; and (iii) granting such other relief as is just and proper.

Dated: August 6, 2024

Respectfully submitted,
DAY RETTIG MARTIN, P.C.

/s/ Paula L. Roby

Paula L. Roby AT0006749

Telephone: (319) 365-0437

FAX: (319) 365-5866

E-mail: paula@drpjlw.com

ATTORNEY FOR THE
OFFICIAL COMMITTEE OF PENSIONERS

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this August 6, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

/s/ Julie G. Quist

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Day Rettig Martin, P.C.

150 1st Avenue NE Suite 415

P. O. Box 2877

Cedar Rapids IA 52406-2877

Phone: 319-365-0437 Fax: 319-365-5866

Mercy Pensioners Committee

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Statement No. 123461

Account No. 100082.01

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Fees

			Rate	Hours	
03/01/2024	JGQ	Draft Administrative Claim for Mercy Pensioners; receive, review and enter claim amounts from Marc Ross; send draft to Attorney Paula Roby for review; finalize and file with Court.	150.00	0.60	90.00
	PLR	Correspondence with Marc Ross regarding Pension Plan Death Audit.	375.00	0.20	75.00
	PLR	Telephone call with Marc Ross regarding Plan Support Agreement and Potential Joinder.	375.00	0.50	187.50
	PLR	Participate in Zoom meeting with Attorney Emily Keil regarding status update.	375.00	0.50	187.50
	PLR	Attention to Exclusivity issues.	375.00	0.70	262.50
	PLR	Receive and revise Administrative Claim of Pensioners Committee.	375.00	1.40	525.00
	PLR	Telephone calls and e-mail correspondence with individual Pensioners to address questions.	375.00	2.10	787.50
	PLR	E-mail correspondence regarding Stakeholders telephone call.	375.00	0.20	75.00
	PLR	E-mail correspondence with Pensioners Committee regarding individual Pensioners questions.	375.00	0.60	225.00
	PLR	Review and approve Final Version Administrative Claim of Pensioners Committee.	375.00	0.10	37.50
	PLR	Review Pensioners Committee update e-mail to individual Pensioners.	375.00	0.20	75.00
03/04/2024	PLR	Telephone call with Attorney Andrew Sherman regarding status update.	375.00	0.50	187.50
	PLR	E-mail correspondence with Stakeholders regarding settlement conference date.	375.00	0.30	112.50
	PLR	Telephone call with Stakeholders Attorneys regarding Exclusivity and Plan and Disclosure Statement.	375.00	0.50	187.50
	PLR	Review e-mail and attachments from Attorney Andrew Sherman regarding Plan and Disclosure Statement; review attached caselaw and correspondence.	375.00	2.20	825.00
	PLR	Attention to issues raised by Unsecured Creditors Committee regarding Plan and Disclosure Statement.	375.00	1.20	450.00
	PLR	Attention to potential Pension Plan Administrator, Agilis.	375.00	2.50	937.50

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Mercy Pensioners Committee

			Rate	Hours	
	PLR	Receive and review Second Motion to Extend Exclusivity Period and Notice of Hearing on Motion to Extend Exclusivity Period and Motion to Use Cash Collateral.	375.00	0.30	112.50
03/05/2024	PLR	Receive and review Proceeding Memo and Order setting Conference on Plan and Disclosure Statement	375.00	0.20	75.00
	PLR	E-mail correspondence with Attorney Nathan Coco regarding Exclusivity and Bondholder proposed Plan.	375.00	0.30	112.50
	PLR	Telephone call with Marc Ross regarding status.	375.00	0.60	225.00
	PLR	Receive and review Applications for Compensation of Counsel for Unsecured Creditors Committee.	375.00	0.60	225.00
	PLR	Participate in status conference with Unsecured Creditors Committee regarding Plan issues.	375.00	1.00	375.00
	PLR	Attention to potential Pension Plan Administration, Agilis.	375.00	2.50	937.50
03/06/2024	PLR	E-mail correspondence amongst Stakeholders regarding rescheduling settlement conference and Motion regarding same.	375.00	0.40	150.00
	PLR	Receive and review Sixth Application for Compensation filed by McDermott Will & Emery for Debtors.	375.00	0.60	225.00
03/07/2024	PLR	Telephone call with Marc Ross regarding status.	375.00	0.30	112.50
	PLR	Attention to potential Causes of Action, including MercyOne.	375.00	1.10	412.50
	PLR	Prepare outline of potential Causes of Action.	375.00	0.30	112.50
03/08/2024	PLR	Receive and review Order Granting Motion to Reschedule Facilitated Conference.	375.00	0.40	150.00
	PLR	Investigation (including telephone calls with committee members) regarding MercyOne actions leading up to bankruptcy; potential liability.	375.00	4.20	1,575.00
	PLR	E-mail correspondence with Adrienne Moore regarding Pension Plan options going forward.	375.00	0.60	225.00
	PLR	E-mail correspondence from Attorney Roy Leaf regarding settlement.	375.00	0.10	37.50
03/11/2024	PLR	Telephone call with Attorney Roy Leaf regarding Plan Support Document.	375.00	0.40	150.00
	PLR	Attention to Plan Support Document.	375.00	0.80	300.00
	PLR	Telephone call with Attorney Nathan Coco regarding Plan Support Document.	375.00	0.40	150.00
	PLR	E-mail correspondence with Pensioners Committee regarding update for Pensioners.	375.00	0.70	262.50
	PLR	Attention to update to Pensions.	375.00	0.10	37.50
	PLR	Telephone call with Marc Ross regarding Unsecured Creditors Committee and Plan.	375.00	0.80	300.00
	PLR	E-mail from Attorney Andrew Sherman with attached Comparison Report and Combined Disclosure Statement and Plan, and Modified Plan; review attached documents.	375.00	3.60	1,350.00
03/13/2024	PLR	Meet with Marc Ross regarding Unsecured Creditors Committee Plan and Debtors Plan.	375.00	1.30	487.50
	PLR	E-mail correspondence with Attorney Andrew Sherman.	375.00	0.10	37.50

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Mercy Pensioners Committee

			Rate	Hours	
	PLR	Telephone call with Attorney Andrew Sherman regarding 3018 Motion.	375.00	0.30	112.50
03/14/2024	JGQ	Follow up with Epiq Corporate Restructuring to ensure Administrative Claim filed for Mercy Pensioners has been properly processed; provide Attorney Paula Roby with confirmation of same.	150.00	0.40	60.00
	PLR	Meet with Marc Ross to discuss Plan options; go forward with strategy.	375.00	5.70	2,137.50
	PLR	Telephone call with Attorney Adrienne Moore regarding Pension Plan sponsor issues.	375.00	1.00	375.00
	PLR	Telephone call with Attorney Roy Leaf regarding Pensioners Committee's Administrative Claim.	375.00	0.40	150.00
	PLR	Meet with Narendra Ganti regarding status.	375.00	0.50	187.50
03/15/2024	PLR	Telephone call with Attorney Roy Leaf regarding potential settlement.	375.00	0.50	187.50
	PLR	Telephone call with Stakeholders regarding upcoming settlement conference.	375.00	0.80	300.00
	PLR	E-mail correspondence amongst Stakeholders regarding settlement negotiations.	375.00	0.80	300.00
	PLR	E-mail correspondence with potential Plan Administrator, Agilis, representatives regarding introductions, case, and Pension Plan background.	375.00	2.90	1,087.50
	PLR	Attention to e-mails from individual Pensioners; e-mail correspondence with Pensioners Committee regarding Pensioner names to be added to correspondence list.	375.00	0.50	187.50
	PLR	Receive and review e-mail from individual Pensioner regarding Administrative Claim of Pensioners; respond to same.	375.00	0.30	112.50
03/17/2024	PLR	Telephone call with Marc Ross regarding update.	375.00	0.40	150.00
03/18/2024	PLR	Participate in Facilitated Conference on Disclosure Statement and Plan.	375.00	1.00	375.00
	PLR	Meet with Marc Ross regarding Facilitated Conference on Disclosure Statement and Plan.	375.00	1.50	562.50
	PLR	Attention to e-mail from Attorney Andrew Sherman regarding challenge deadline.	375.00	0.10	37.50
	PLR	Telephone call with Attorney Nathan Coco regarding challenge deadline.	375.00	0.30	112.50
	PLR	E-mail correspondence amongst Stakeholders regarding financial analysis following Facilitated Conference and objections to same.	375.00	1.10	412.50
03/19/2024	PLR	Telephone call with Attorney Daniel Simon regarding settlement follow up.	375.00	0.50	187.50
	PLR	Attention to correspondence between Financial Advisors for Stakeholders regarding settlement.	375.00	0.10	37.50
	PLR	Telephone call with Marc Ross regarding Facilitated Conference and parties communications after.	375.00	0.50	187.50
	PLR	Meet with Attorney Andrew Sherman regarding Pension Plan negotiations.	375.00	0.80	300.00

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Mercy Pensioners Committee

			Rate	Hours	
03/21/2024	PLR	Attention to Settlement Proposal from Bondholders and Bondholders comments to Plan.	375.00	1.10	412.50
	PLR	Telephone call with Marc Ross regarding Settlement Proposal from Bondholders and how Pensioners will be impacted.	375.00	0.70	262.50
	PLR	Telephone call with Attorney Nathan Coco regarding formal approval by Bondholders.	375.00	0.10	37.50
	PLR	E-mail correspondence with Ryan McGlothlin regarding proposal regarding Pension Plan Administrator; reviewed attached documents.	375.00	3.60	1,350.00
03/22/2024	PLR	Telephone call with Attorney Nathan Coco to discuss Plan.	375.00	0.50	187.50
	PLR	Receive and review Support Document to Disclosure Statement and Plan and Notice of same.	375.00	0.40	150.00
03/23/2024	PLR	Attention to revised Recovery Analysis from Marc Ross.	375.00	0.70	262.50
	PLR	Attention to settlement terms.	375.00	1.50	562.50
	PLR	Prepare memorandum regarding settlement terms and Recovery Analysis.	375.00	1.10	412.50
	PLR	Multiple telephone calls with Marc Ross and Bondholders regarding potential Plan proposals.	375.00	1.50	562.50
	PLR	Meet with Attorney Megan Preusker regarding proposed changes to plan.	375.00	0.50	187.50
03/24/2024	PLR	Telephone call with Marc Ross regarding Plan proposals.	375.00	1.50	562.50
	PLR	E-mail correspondence with Attorney Andrew Sherman regarding continuing settlement negotiations.	375.00	0.20	75.00
	PLR	E-mail from Attorney Daniel Simon regarding settlement negotiations.	375.00	0.10	37.50
	PLR	E-mail correspondence with Marc Ross regarding potential Settlement proposal.	375.00	0.40	150.00
	PLR	Work on Settlement proposal.	375.00	1.30	487.50
	PLR	E-mail correspondence with Attorney Nathan Coco regarding Recovery Analysis.	375.00	0.30	112.50
03/25/2024	PLR	Receive and review Unsecured Creditors Committee's Objection to Disclosure Statement and Plan, Modified Disclosure Statement and Plan of Liquidation, U.S. Trustee's Objection to Confirmation of Plan and Disclosure Statement, MediRevv, LLC's Response to Disclosure Statement and Plan, and Expedited Motion to Continue Hearing On Cash Collateral Motion.	375.00	1.50	562.50
	PLR	Telephone calls and correspondence with Marc Ross regarding Plan proposals.	375.00	0.60	225.00
	PLR	Meet with Attorney Andrew Sherman regarding Plan issues.	375.00	0.20	75.00
	PLR	Meet with Attorney Nathan Coco, Pensioner Committee representatives, Bondholder representatives, and Debtor representatives regarding upcoming Hearing.	375.00	2.30	862.50
	PLR	Telephone call with Attorney Nathan Coco regarding potential breakdown of settlement negotiation.	375.00	0.50	187.50
	PLR	E-mails from Attorney Andrew Sherman regarding Complaint against Preston Hollow.	375.00	0.50	187.50

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Mercy Pensioners Committee

			Rate	Hours	
	PLR	Analysis of Objections filed to Disclosure Statement and Plan and potential effects of same on Pensioners.	375.00	3.40	1,275.00
	PLR	Participate in settlement negotiations.	375.00	0.80	300.00
	PLR	E-mail from Attorney Roy Leaf regarding cash collateral.	375.00	0.20	75.00
03/26/2024	PLR	Meet with Marc Ross regarding Hearing.	375.00	3.00	1,125.00
	PLR	Legal research regarding MercyOne's Objection grounds; whether fatal to Plan.	375.00	2.10	787.50
	PLR	E-mail correspondence with Attorneys Nathan Coco and Megan Preusker regarding Hearing.	375.00	0.30	112.50
	PLR	Receive and review Order Granting Expedited Motion to Continue Hearing on Cash Collateral Motion.	375.00	0.10	37.50
03/27/2024	PLR	Meet with Attorneys and Financial Advisors for Unsecured Creditors Committee and attend Hearing on Plan and Disclosure Statement.	375.00	6.50	2,437.50
03/28/2024	PLR	Receive and review Proceeding Memo and Order and Order Extending Exclusivity Period.	375.00	0.30	112.50
	PLR	Correspondence with Marc Ross regarding revised Disclosure Statement.	375.00	0.80	300.00
	PLR	E-mail from B Mankovetskity with Unsecured Creditors Committees redlined Amended Plan; review same.	375.00	0.90	337.50
	PLR	Receive and review numerous Orders Granting Rejection of Contracts.	375.00	0.60	225.00
	PLR	Continue Plan language discussions with Stakeholders.	375.00	1.40	525.00
	PLR	Telephone call with Marc Ross regarding Plan Administrator Provisions in Amended Plan.	375.00	0.70	262.50
	PLR	Telephone call with Agilis regarding Plan Administrator Provisions in Amended Plan.	375.00	0.40	150.00
03/29/2024	JGQ	Begin draft of First Application for Compensation of Day Rettig Martin, P.C.	150.00	1.30	195.00
	PLR	Receive and review Support Document to Disclosure Statement and Plan.	375.00	0.70	262.50
	PLR	Work on Disclosure Statement changes; telephone calls with Marc Ross and Narendra Ganti regarding same.	375.00	4.70	1,762.50
	PLR	Continue Amended Plan negotiations amongst Stakeholders.	375.00	2.30	862.50
	PLR	Receive and review draft Plan Support Letter from Unsecured Creditors Committee.	375.00	0.40	150.00
	PLR	Work on Plan Support Letter for Pensioners Committee.	375.00	1.40	525.00
	PLR	Update Pensioners Committee on negotiations.	375.00	1.30	487.50
	PLR	Attention to Administrative Claims filed.	375.00	1.20	450.00
	PLR	All hands call regarding Amended Plan issues.	375.00	0.60	225.00
		For Current Services Rendered		112.90	41,820.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Paula L Roby	110.60	\$375.00	\$41,475.00
Julie G. Quist	2.30	150.00	345.00

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Mercy Pensioners Committee

Total Current Work	41,820.00
Previous Balance	\$35,214.00
Balance Due	<u>\$77,034.00</u>

Please make all checks payable to Day Rettig Martin, P.C. Thank you.

Mercy Pensioners Committee

March 2-31, 2024

SUMMARY OF SERVICE BY PROJECT

A. Assets Analysis and Recovery

Date	Tmkpr	Time	Amount	Description
03/01/24	PLR	1.40	525.00	Receive and revise Administrative Claim of Pensioners Committee.
03/01/24	PLR	0.10	37.50	Review and approve Administrative Claim of Pensioners Committee.
03/23/24	PLR	0.70	262.50	Attention to revised Recovery Analysis from Marc Ross.
Totals:		2.20	825.00	

B. Case Administration

Date	Tmkpr	Time	Amount	Description
03/01/24	JGQ	0.60	90.00	Draft Administrative Claim for Mercy Pensioners; receive, review and enter claim amounts from Marc Ross; send draft to Attorney Paula Roby for review; finalize and file with Court.
03/14/24	JGQ	0.40	60.00	Follow up with Epiq Corporate Restructuring to ensure Administrative Claim filed for Mercy Pensioners has been processed; provide Attorney Paula Roby with items proving the Proof of Claim was filed.
03/23/24	PLR	1.50	562.50	Attention to settlement terms.
03/23/24	PLR	1.10	412.50	Prepare memorandum regarding settlement terms and Recovery Analysis.
03/24/24	PLR	1.30	487.50	Work on Settlement proposal.
Totals:		4.90	1612.50	

C. Court Hearings

Date	Tmkpr	Time	Amount	Description
03/18/24	PLR	1.00	375.00	Participate in Facilitated Conference on Disclosure Statement and Plan.
03/27/24	PLR	6.50	2437.50	Meet with Attorneys and Financial Advisors for Unsecured Creditors Committee and attend Hearing on Plan and Disclosure Statement.
Totals:		7.50	2812.50	

D. Employment and Fee Applications

Date	Tmkpr	Time	Amount	Description
03/29/24	JGQ	1.30	195.00	Begin draft of First Application for Compensation and Reimbursement of Expenses of Counsel to the Official Committee of Pensioners.
Totals:		1.30	195.00	

F. Litigation Planning

Date	Tmkpr	Time	Amount	Description
03/07/24	PLR	1.10	412.50	Attention to potential Causes of Action, including MercyOne.
03/07/24	PLR	0.30	112.50	Prepare outline of potential Causes of Action.
03/08/24	PLR	4.20	1575.00	Investigation (including telephone calls with committee members) regarding MercyOne actions leading up to bankruptcy; potential liability.
Totals:		5.60	2100.00	

G. Meetings and Communications with Professionals

Date	Tmkpr	Time	Amount	Description
03/01/24	PLR	0.20	75.00	Correspondence with Marc Ross regarding Pension Plan Death Audit.
03/01/24	PLR	0.50	187.50	Telephone call with Marc Ross regarding Plan Support Agreement and Potential Joinder.
03/01/24	PLR	0.50	187.50	Participate in Zoom meeting with Attorney Emily Keil regarding status update.
03/01/24	PLR	2.10	787.50	Telephone calls and e-mail correspondence with individual Pensioners to address questions.
03/01/24	PLR	0.20	75.00	E-mail correspondence regarding Stakeholders telephone call.
03/01/24	PLR	0.60	225.00	E-mail correspondence with Pensioners Committee regarding individual Pensioners questions.
03/01/24	PLR	0.20	75.00	Review Pensioners Committee update e-mail to individual Pensioners.
03/04/24	PLR	0.50	187.50	Telephone call with Attorney Andrew Sherman regarding status update.
03/04/24	PLR	0.30	112.50	E-mail correspondence with Stakeholders regarding settlement conference date.
03/04/24	PLR	0.50	187.50	Telephone call with Stakeholders Attorneys regarding Exclusivity and Plan and Disclosure Statement.
03/04/24	PLR	2.20	825.00	Review e-mail and attachments from Attorney Andrew Sherman regarding Plan and Disclosure Statmenet; review attached caselaw and correspondence.
03/05/24	PLR	2.50	937.50	Attention to potential Pension Plan Adminstrator, Agilis.
03/05/24	PLR	1.00	375.00	Participate in status conference with Unsecured Creditors Committee regarding Plan issues.
03/05/24	PLR	0.30	112.50	E-mail correspondence with Attorney Nathan Coco regarding Exclusivity and Bondholders proposed Plan.
03/05/24	PLR	0.60	225.00	Telephone call with Marc Ross regarding status.

03/06/24	PLR	0.40	150.00	E-mail correspondence amongst Stakeholders regarding rescheduling settlement conference and
03/07/24	PLR	0.30	112.50	Telephone call with Marc Ross regarding status.
03/08/24	PLR	0.60	225.00	E-mail correspondence with Adrienne Moore regarding Pension Plan options going forward.
03/08/24	PLR	0.10	37.50	E-mail correspondence from Attorney Roy Leaf regarding settlement.
03/11/24	PLR	0.40	150.00	Telephone call with Attorney Roy Leaf regarding Plan Support Document.
03/11/24	PLR	0.40	150.00	Telephone call with Attorney Nathan Coco regarding Plan Support Document.
03/11/24	PLR	3.60	1350.00	E-mail from Attorney Andrew Sherman with attached Comparison Report and Combined Disclosure Statement and Plan, and Modified Plan; review attached documents.
03/11/24	PLR	0.80	300.00	Telephone call with Marc Ross regarding Unsecured Creditors Committee and Plan.
03/11/24	PLR	0.70	262.50	E-mail correspondence with Pensioners Committee regarding update for Pensioners.
03/13/24	PLR	1.30	487.50	Meet with Marc Ross regarding Unsecured Creditors Committee Plan and Debtors Plan.
03/13/24	PLR	0.10	37.50	E-mail correspondence with Attorney Andrew Sherman.
03/13/24	PLR	0.30	112.50	Telephone call with Attorney Andrew Sherman regarding 3018 Motion.
03/14/24	PLR	5.70	2137.50	Meet with Marc Ross to discuss Plan options; go forward with strategy.
03/14/24	PLR	1.00	375.00	Telephone call with Attorney Adrienne Moore regarding Pension Plan sponsor issues.
03/14/24	PLR	0.50	187.50	Meet with Narendra Ganti regarding status.
03/14/24	PLR	0.40	150.00	Telephone call with Attorney Roy Leaf regarding Pensioners Committee's Administrative Claim.
03/15/24	PLR	0.50	187.50	Telephone call with Attorney Roy Leaf regarding potential settlement.
03/15/24	PLR	0.80	300.00	Telephone call with Stakeholders regarding upcoming settlement conference.
03/15/24	PLR	0.30	112.50	Receive and review e-mail from individual Pensioner regarding Admin Claim, respond to same.
03/15/24	PLR	0.80	300.00	E-mail correspondence amongst Stakeholders regarding settlement negotiations.
03/15/24	PLR	2.90	1087.50	E-mail correspondence with potential Plan Administrator, Agilis, representatives regarding introductions, case, and Pension Plan background.
03/15/24	PLR	0.50	187.50	Attention to e-mails from individual Pensioners; e-mail correspondence with Pensioners Committee regarding Pensioner names to be added to correspondence list.
03/17/24	PLR	0.40	150.00	Telephone call with Marc Ross regarding update.
03/18/24	PLR	1.50	562.50	Meet with Marc Ross regarding Facilitated Conference on Disclosure Statement and Plan.
03/18/24	PLR	0.10	37.50	Attention to e-mail from Attorney Andrew Sherman regarding challenge deadline.
03/18/24	PLR	0.30	112.50	Telephone call with Attorney Nathan Coco regarding challenge deadline.
03/18/24	PLR	1.10	412.50	E-mail correspondence amongst Stakeholders regarding financial analysis following Facilitated Conference and objections to same.
03/19/24	PLR	0.80	300.00	Meet with Attorney Andrew Sherman regarding Plan negotiations.
03/19/24	PLR	0.50	187.50	Telephone call with Attorney Daniel Simon regarding settlement follow up.
03/19/24	PLR	0.10	37.50	Attention to correspondence between Financial Advisors for Stakeholders regarding settlement.
03/19/24	PLR	0.50	187.50	Telephone call with Marc Ross regarding Facilitated Conference and parties communications after.
03/21/24	PLR	0.70	262.50	Telephone call with Marc Ross regarding Settlement Proposal from Bondholders and how Pensioners will be impacted.
03/21/24	PLR	0.10	37.50	Telephone call with Attorney Nathan Coco regarding formal approval by Bondholders.
03/21/24	PLR	3.60	1350.00	E-mail correspondence with Ryan McGlothlin regarding proposal regarding Pension Plan Administrator; reviewed attached documents.
03/22/24	PLR	0.50	187.50	Telephone call with Attorney Nathan Coco to discuss Plan.
03/23/24	PLR	1.50	562.50	Multiple telephone calls with Marc Ross and Bondholders regarding potential Plan proposals.
03/23/24	PLR	0.50	187.50	Meet with Attorney Megan Preusker regarding proposed changes to plan.
03/24/24	PLR	1.50	562.50	Telephone call with Marc Ross regarding Plan proposals.
03/24/24	PLR	0.20	75.00	E-mail correspondence with Attorney Andrew Sherman regarding continuing settlement negotiations.
03/24/24	PLR	0.10	37.50	E-mail from Attorney Daniel Simon regarding settlement negotiations.
03/24/24	PLR	0.40	150.00	E-mail correspondence with Marc Ross regarding potential Settlement proposal.
03/24/24	PLR	0.30	112.50	E-mail correspondence with Attorney Nathan Coco regarding Recovery Analysis.
03/25/24	PLR	0.60	225.00	Telephone calls and correspondence with Marc Ross regarding Plan proposals.
03/25/24	PLR	0.20	75.00	Meet with Attorney Andrew Sherman regarding Plan issues.
03/25/24	PLR	2.30	862.50	Meet with Attorney Nathan Coco, Pensioner Committee representatives, Bondholder
03/25/24	PLR	0.50	187.50	Telephone call with Attorney Nathan Coco regarding potential breakdown of settlement negotiation.
03/25/24	PLR	0.50	187.50	E-mails from Attorney Andrew Sherman regarding Complaint against Preston Hollow.
03/25/24	PLR	0.80	300.00	Participate in settlement negotiations.
03/25/24	PLR	0.20	75.00	E-mail from Attorney Roy Leaf regarding cash collateral.
03/26/24	PLR	3.00	1125.00	Meet with Marc Ross regarding Hearing.

03/26/24	PLR	0.30	112.50	E-mail correspondence with Attorneys Nathan Coco and Megan Preusker regarding Hearing.
03/28/24	PLR	0.80	300.00	Correspondence with Marc Ross regarding revised Disclosure Statement.
03/28/24	PLR	0.90	337.50	E-mail from B Mankovetsky with Unsecured Creditors Committees redlined Amended Plan; review same.
03/28/24	PLR	1.40	525.00	Continue Plan language discussions with Stakeholders.
03/28/24	PLR	0.70	262.50	Telephone call with Marc Ross regarding Plan Administrator Provisions in Amended Plan.
03/28/24	PLR	0.40	150.00	Telephone call with Agilis regarding Plan Administrator Provisions in Amended Plan.
03/29/24	PLR	2.30	862.50	Continue Amended Plan negotiations amongst Stakeholders.
03/29/24	PLR	1.30	487.50	Update Pensioners Committee on negotiations.
03/29/24	PLR	0.60	225.00	All hands call regarding Amended Plan issues.
Totals:		66.10	24787.50	

H. Pension Analysis

Date	Tmkpr	Time	Amount	Description
03/05/24	PLR	2.50	937.50	Attention to potential Pension Plan Administration, Agilis.
03/11/24	PLR	0.10	37.50	Attention to update to Pensions.
Totals:		2.60	975.00	

I. Plan and Disclosure Statement

Date	Tmkpr	Time	Amount	Description
03/01/24	PLR	0.70	262.50	Attention to Exclusivity issues.
03/04/24	PLR	1.20	450.00	Attention to issues raised by Unsecured Creditors Committee regarding Plan and Disclosure Statement.
03/11/24	PLR	0.80	300.00	Attention to Plan Support Document.
03/21/24	PLR	1.10	412.50	Attention to Settlement Proposal from Bondholders and Bondholders comments to Plan.
03/25/24	PLR	3.40	1275.00	Analysis of Objections filed to Disclosure Statement and Plan and potential effects of same on Pensioners.
03/26/24	PLR	2.10	787.50	Legal research regarding MercyOne's Objection grounds; whether fatal to Plan.
03/29/24	PLR	4.70	1762.50	Work on Disclosure Statement changes; telephone calls with Marc Ross and Narendra Ganti regarding same.
03/29/24	PLR	0.40	150.00	Receive and review draft Plan Support Letter from Unsecured Creditors Committee.
03/29/24	PLR	1.40	525.00	Work on Plan Support Letter for Pensioners Committee.
Totals:		15.80	5925.00	

J. Review Pleadings

Date	Tmkpr	Time	Amount	Description
03/04/24	PLR	0.30	112.50	Receive and review Second Motion to Extend Exclusivity Period and Notice of Hearing on Motion to Extend Exclusivity Period and Motion to Use Cash Collateral.
03/05/24	PLR	0.20	75.00	Receive and review Proceeding Memo and Order setting Conference on Plan and Disclosure Statement
03/05/24	PLR	0.60	225.00	Receive and review Applications for Compensation of Counsel for Unsecured Creditors Committee.
03/08/24	PLR	0.40	150.00	Receive and review Order Granting Motion to Reschedule Facilitated Conference.
03/08/24	PLR	0.60	225.00	Receive and review Sixth Application for Compensation filed by McDermott Will & Emery for Debtors.
03/22/24	PLR	0.40	150.00	Receive and review Support Document to Disclosure Statement and Plan and Notice of same.
03/25/24	PLR	1.50	562.50	Receive and review Unsecured Creditors Committee's Objection to Disclosure Statement and Plan, Modified Disclosure Statement and Plan of Liquidation, U.S. Trustee's Objection to Confirmation of Plan and Disclosure Statement, MediRevv, LLC's Response to Disclosure Statement and Plan, and Expedited Motion to Continue Hearing On Cash Collateral Motion.
03/26/24	PLR	0.10	37.50	Receive and review Order Granting Expedited Motion to Continue Hearing on Cash Collateral Motion.
03/28/24	PLR	0.30	112.50	Receive and review Proceeding Memo and Order and Order Extending Exclusivity Period.
03/28/24	PLR	0.60	225.00	Receive and review numerous Orders Granting Rejection of Contracts.
03/29/24	PLR	0.70	262.50	Receive and review Support Document to Disclosure Statement and Plan.
03/29/24	PLR	1.20	450.00	Attention to Administrative Claims filed.
Totals:		6.90	2587.50	

All:	Hrs to Bill	Amount
	112.90	41820.00
	Fees 80%	33456.00

Expenses	0.00
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Grand Total:	33456.00
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